

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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KATHERINE YOST,	:
	:
Plaintiff,	:
	:
-against-	: Case No. 1:22-cv-06549(PAE)(GWG)
	:
EVERYREALM INC., COMPOUND ASSET	:
MANAGEMENT LLC, REALM METAVERSE	: <b>DEFENDANTS EVERYREALM</b>
REAL ESTATE INC., REPUBLIC, REPUBLIC	: <b>INC., JANINE YORIO, WILLIAM</b>
CRYPTO LLC, REPUBLIC REALM MANAGER	: <b>KERR, AND ZACH HUNGATE’S</b>
LLC, REPUBLIC REALM INC., REPUBLIC	: <b>NOTICE OF RULE 11 MOTION</b>
OPERATIONS LLC, OPENDEAL INC.,	: <b>FOR SANCTIONS AGAINST</b>
OPENDEAL PORTAL LLC, JANINE YORIO in	: <b>PLAINTIFF KATHERINE YOST</b>
her individual and professional capacities,	: <b>AND SEPPINNI, LLP</b>
WILLIAM KERR in his individual and	:
professional capacities, and ZACH HUNGATE in	:
his individual and professional capacities.	:
	:
Defendants.	:
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**PLEASE TAKE NOTICE THAT** Defendants Everyrealm Inc. (f/k/a Republic Realm Inc.), Janine Yorio, William Kerr, and Zach Hungate (collectively “the Everyrealm Defendants”) shall, upon Plaintiff Katherine Yost’s (“Plaintiff”) Second Amended Complaint; the Everyrealm Defendants’ Memorandum of Law; the Declaration of William Kerr, and the exhibits attached thereto; and the Declaration of Janine Yorio, and the exhibits attached thereto; all filed herewith, move this Court, at Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, on such date and time as the Court may direct, for an Order pursuant to Federal Rule of Civil Procedure (“FRCP”) 11 dismissing Plaintiff’s Complaint as to her claim for sexual harassment and issuing monetary sanctions against Plaintiff and her Counsel, Seppinni LLP.

PLEASE TAKE FURTHER NOTICE THAT pursuant to Local Rule 6.1(b) of the United States District Court for the Southern District of New York, any opposing declarations or answering memoranda must be served on or before February 28, 2023, and reply declarations and memoranda must be served on or before March 7, 2023.

Dated: New York, New York  
February 14, 2023

PROSKAUER ROSE LLP

By: /s/ Lloyd B. Chinn

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Realm Inc.), Janine Yorio, William Kerr,  
and Zach Hungate*